

EXHIBIT 1

- b. In that it failed to maintain the store premises in a safe condition so as to protect its customers and business invitees from harm;
 - c. In that it failed to adequately supervise its employees to ensure that the store premises were kept and maintained in a safe and operable condition so as to prevent harm to customers and business invitees entering the same; and
 - d. In that it breached the duty of care it owed to customers and business invitees.
 - e. In that it failed to follow its own policies and procedures regarding maintaining its store premises in a safe condition.
5. Defendant is liable for the acts and actions of all of its managers, employees, agents, servants, and/or representatives working or involved in or with operating and maintaining the Premises. Defendant's liability to Plaintiff is also founded and based upon, but not limited to, the Doctrine of *Respondeat Superior*.
6. As the direct and proximate cause of Defendant's negligent acts, actions, and omissions as noted above, Plaintiff, Betty Jean Taylor, sustained multiple significant injuries. She experienced and continues to experience significant pain and discomfort all to her detriment for which she prays judgment in excess of \$ 75,000.00.

WHEREFORE, Plaintiff, Betty Jean Taylor, respectfully prays for judgment against Defendant in an amount in excess of \$ 75,000.00, costs of the court and any other relief this Court deems just and proper.

Respectfully submitted,
LAWTER & ASSOCIATES, P.L.L.C.

By:

A handwritten signature in black ink, appearing to read "J. Bolitho", is written over a horizontal line.

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